

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiff,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**CONSENT MOTION TO EXTEND DEADLINE FOR REPLY**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), by counsel, respectfully submit this Consent Motion to Extend Deadline for Reply.

Plaintiffs respectfully request a brief extension of time to file their reply in support of their cross-motion for summary judgment. Plaintiffs’ filed their cross-motion for summary judgment in conjunction with their opposition to Defendants’ summary judgment motion on December 23, 2016. Defendants filed their opposition to Plaintiffs’ cross-motion in conjunction with their reply in support of Defendants’ motion on January 6, 2017. Plaintiffs’ reply in support of their cross-motion is currently due Thursday, January 12, 2017. *See* E.D.Va. L.R. 7(F)(1). To accommodate counsel’s schedule, Plaintiffs respectfully request a brief extension of 2 business days (5 calendar days in light of the weekend and intervening Federal holiday) to file their reply.

Counsel for Plaintiffs has conferred with counsel for Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates,

Inc. (collectively “Defendants”), who has advised that Defendants consent to the relief sought.

A proposed Order is attached.

DATED January 9, 2017.

Respectfully submitted,

*/s/ Paul Brinkman*

---

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Paul Brinkman, VSB # 35950

Jeanhee Hong (*pro hac vice*)

Ariel Wade Trajtenberg (*pro hac vice*)

Diego Durán de la Vega (*pro hac vice*)

Jongwook Kim (*pro hac vice*)

William A. Margeson (*pro hac vice*)

777 Sixth Street NW, 11<sup>th</sup> Floor

Washington, District of Columbia 20001

Phone: (202) 538-8000

Fax: (202) 538-8100

[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

[joyodom@quinnemanuel.com](mailto:joyodom@quinnemanuel.com)

[jeanheehong@quinnemanuel.com](mailto:jeanheehong@quinnemanuel.com)

[arieltrajtenberg@quinnemanuel.com](mailto:arieltrajtenberg@quinnemanuel.com)

[diegoduran@quinnemanuel.com](mailto:diegoduran@quinnemanuel.com)

[wookiekim@quinnemanuel.com](mailto:wookiekim@quinnemanuel.com)

[billmargeson@quinnemanuel.com](mailto:billmargeson@quinnemanuel.com)

LEGAL AID JUSTICE CENTER

Simon Sandoval-Moshenberg, VSB #77110

Rebecca Wolozen, VSB #89690

6066 Leesburg Pike, Suite 520

Falls Church, VA 22041

Phone: (703) 778-3450

Fax: (703) 778-3454

[simon@justice4all.org](mailto:simon@justice4all.org)

[becky@justice4all.org](mailto:becky@justice4all.org)

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of January, 2017, I filed the foregoing Motion to Extend Deadline for Reply electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

Grayson P. Hanes, VSB #06614  
Michael S. Dingman, VSB #30031  
Justin deBettencourt, VSB #83806  
REED SMITH LLP  
7900 Tysons One Place, Suite 500  
McLean, Virginia 22102  
Phone: (703) 641-4200  
Fax: (703) 641-4340  
[ghanes@reedsmith.com](mailto:ghanes@reedsmith.com)  
[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)  
[jdbettencourt@reedsmith.com](mailto:jdbettencourt@reedsmith.com)

*Counsel for Defendants*

*/s/ Paul Brinkman*

---

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
Paul Brinkman, VSB # 35950

777 Sixth Street NW, 11<sup>th</sup> Floor  
Washington, District of Columbia 20001-3706  
Phone: (202) 538-8000  
Fax: (202) 538-8100  
[paulbrinkman@quinnemanuel.com](mailto:paulbrinkman@quinnemanuel.com)

*Counsel for Plaintiffs*